

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SONIA VAZQUEZ

*Plaintiff,*

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vs.

CIVIL ACTION NO. 23-04449

WAL-MART STORES TEXAS,

LLC

*Defendant.*

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**PLAINTIFF'S NOTICE OF FIRST SUPPLEMENTAL RULE 26 DISCLOSURES**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

COMES NOW, Plaintiff SONIA VAZQUEZ, and notifies the Court that on the 26<sup>th</sup> day of February 2025, the following was submitted to all counsel of record, pursuant to the Federal Rules of Civil Procedure and Local Rules of the Southern District of Texas:

1. Plaintiff's First Supplemental Rule 26 Disclosures

Respectfully submitted,

THE MENDOZA LAW FIRM, PLLC

By:



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Mathew E. Mendoza  
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*COUNSELS FOR PLAINTIFF*

**CERTIFICATE OF SERVICE**

I hereby certify a true and correct copy of the foregoing instrument was forwarded to all interested counsel in accordance with the Federal Rules of Civil Procedure on this 26th day of February 2025.



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Mathew E. Mendoza

**PLAINTIFF'S SUPPLEMENTAL RULE 26 DISCLOSURES**

**FRCP 26(a)(1)(A)(i):**

The name and, if known, the address and telephone number of each individual likely to have discoverable information- along with the subjects of that information- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

**RESPONSE:**

1. Sonia Vazquez, Plaintiff  
c/o Mathew E. Mendoza  
720 West Alabama Street  
Houston, Texas 77006  
Tel: (713) 651-1037  
Plaintiff is knowledgeable about the circumstances surrounding the incident made the basis of this lawsuit and the injuries and damages sustained by her therefrom.

2. Wal-Mart Stores Texas, LLC  
c/o John A. Ramirez, and Tiffany Walker-Killip  
5615 Kirby Drive, Suite 900  
Houston, Texas 77005  
Tel: (713) 626-1555  
Defendant is knowledgeable about the circumstances surrounding the incident made the basis of this lawsuit.

3. Injury Center of Houston - Greenspoint  
Lynnette Orrick  
12941 North Fwy, #216  
Houston, TX 77060  
Phone: (713) 771-2225

See designation below.

4. Unicare MRI & Diagnostic Center  
Nalyer Iman  
7007 North Freeway, Suite 110  
Houston, TX 77076  
Phone: (713) 691-6700

See designation below.

5. Swiftcare Accident and Injury  
5005 W. 34<sup>th</sup> Street, #103c  
Houston, TX 77092  
Phone: (833) 794-3874

See designation below.

6. Minivasive Pain & Orthopedics - Spring  
Edward Lee, MD  
3301 Spring Stuebner Rd. #110  
Houston, TX 77389  
Phone: (346) 800-6001

See designation below.

7. Townsend Memorial Surgery Center - Spring  
David Nguyen, MD  
3301 Spring Stuebner Rd.  
Houston, TX 77389  
Phone: (346) 386-6700

See designation below.

8. Memorial Wellness RX  
Nicole Miller  
2918 San Jacinto  
Houston, TX 77004  
Phone: (713) 523-7847

**FIRST SUPPLEMENTAL RESPONSE:**

9. **Edgar Lopez**  
**1710 Greens Road, C14**  
**Houston, Texas 77032**  
**Husband to Plaintiff Sonia Vasquez**  
**Edgar Lopez is knowledgeable about Plaintiff Sonia Vasquez's pain and suffering.**
10. **A.L., Minor Child**  
**1710 Greens Road, C14**  
**Houston, Texas 77032**  
**Minor Child of Edgar Lopez and Plaintiff Sonia Vasquez**  
**A.L. is knowledgeable about Plaintiff Sonia Vasquez's pain and suffering.**

See designation below.

With respect to the treating physicians and health care providers, you are referred to Plaintiff's Designation of Experts, along with the expert reports that have been and will be prepared by these experts and which have been and will be produced in this case.

All treating physicians, healthcare providers and custodian of records identified above, including all treating physicians, nurses, healthcare providers and custodian of records

identified in the medical and billings records of the above identified facilities, may be called to testify, without limitation, regarding: (1) the Plaintiff's injuries sustained from the subject incident that makes the basis of this lawsuit; (2) the Plaintiff's conditions, symptomatology, diagnosis, and treatment resulting from the incident that makes the basis of this lawsuit; (3) any reasonable and necessary medical treatment related to the incident that makes the basis of this lawsuit or injuries; (4) any reasonable and necessary medical treatment that in all reasonable probability may be necessary in the future; (5) causation of the injuries and/or conditions; (6) reasonable and necessary billing charges for past and/or future treatment; (7) the authenticity and admissibility of any and all medical records and/or billing records pertaining to the Plaintiff; and (8) any pain and suffering, and impairment, and past and future, sustained by Plaintiff. Plaintiff hereby incorporate by reference the medical and billing records of these providers, which have been produced. These medical providers may testify that Plaintiff's injuries were caused by the incident made the basis of this suit, that all medical treatment and billing charges were usual and customary, reasonable and necessary, and caused by the incident made the basis of this suit, and may testify regarding the pain, suffering, and impairment sustained by Plaintiff, past and future.

**FRCP 26 (a)(1)(A)(ii):**

A copy – or description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

**RESPONSE:**

See documents produced by the Plaintiff.

**FRCP 26(a)(1)(A)(iii):**

A computation of each category of damages claimed by the disclosing party- who must also make available to inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

**RESPONSE:**

Medical Expenses:

The following computation of medical expenses that are paid and incurred are based upon the billing records obtained with affidavits that have been provided by the health care providers and which have been produced in this case. The computation of medical expenses that are paid and incurred is as follows:

**A. Sonia Vasquez's Medical Expenses-Paid and/or Incurred**

Medical	Total	Paid	Adjusted	Balance
Injury Center of Houston	\$4,361.00	0.00	0.00	\$4,361.00
Unicare MRI & Diagnostic Center	\$11,850.00	0.00	0.00	\$11,850.00
Swiftcare Accident and Injury	0.00	0.00	0.00	0.00
Minivasive Pain & Orthopedic	\$18,560.00	0.00	0.00	\$18,560.00
Townsend Memorial Surgery Center	\$34,124.95	0.00	0.00	\$34,124.95
Memorial Wellness RX	\$1,986.03	0.00	0.00	\$1,986.03
<b>TOTAL</b>	<b>\$70,881.98</b>	<b>0.00</b>	<b>0.00</b>	<b>\$70,881.98</b>

The following elements of damage will be determined by the trier of fact: (1) Mental Anguish; (2) Pain and Suffering; (3) Physical Impairment; and (4) Disfigurement.

**FRCP (a)(1)(A)(iv):**

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**RESPONSE:**

Not applicable.